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MAY 24 2023

U.S. District Court
Middle District of Tennessee

THE UNITED STATES DISTRICT COURT FOR
THE MIDDLE DISTRICT OF TENNESSEE

DANIEL LEE MILES
PLAINTIFF

VS

WILLIAMSON COUNTY SHERIFFS OFFICE
DEFENDANT

CASE NUMBER 03-23 0528

JUDGE _____

MAGISTRATE JUDGE _____

CIVIL LAWSUIT

COMES TO THE PLAINTIFF DANIEL MILES, PRO SE
AND INFORMA FORAYS, BEING INDIGENT AND
HAVING NO WAY TO PAY FILING FEES ON THIS
CASE HEREBY ASKS THE COURT TO PROCEED WITHOUT
PAYING THE FILING FEES. I WILL ALSO INCLUDE
A STATEMENT ABOUT MY FINANCIAL SITUATION AND
REQUEST THE COURT SEND ME THE AO 240 ~~AND~~
AFR APPLICATION. THANK YOU

ON THE 13 DAY OF MAY 2023 I WAS TRANSPORTED
FROM THE JACKSON COUNTY JAIL TO THE WILLIAMSON
COUNTY SHERIFFS OFFICE (JAIL). I WAS RECEIVED
~~AND~~ EXAMINED BY THE NURSE AND EXPLAINED THAT
I HAD A STROKE IN JUNE OF 2018 THAT LEFT
ME PARTIALLY PARALYZED ON MY ~~RIGHT~~ RIGHT SIDE

SHE SAID THAT I LOOKED LIKE I WAS
"GETTING AROUND PRETTY GOOD" AND DECIDED TO
PUT ME IN GENERAL POPULATION IN POD 314.

I REALIZED SHORTLY AFTER I GOT IN 314
THAT THERE WAS NO HANDICAP ACCESSIBLE TOILET
OR SHOWER SO I PUT A MEDICAL REQUEST
IN FOR A TOILET CHAIR TO USE OVER THE TOILET
AND IN THE SHOWER. I NEVER ~~RECEIVED~~ RECEIVED
A RESPONSE FROM MY MEDICAL REQUEST. SO
I ASKED THE NURSES FOR 2 DAYS WHEN THEY
CAME AROUND TO CHECK MY BLOOD PRESSURE
BUT WAS TOLD THAT THEY DIDNT KNOW ANYTHING
ABOUT IT.

ON MAY 15 2023 I NOTICED THE FLOORS
IN POD 314 WERE WET. I ASKED THE GUARDS
~~POD~~ ABOUT THE FLOORS AND EXPLAINED TO
THEM THAT MY RIGHT LEG IS PARALYZED
AND THAT I WAS HAVING TROUBLE WALKING
SAFELY. THEY TOLD ME TO BE CAREFUL. I
THEN TOLD THE NURSE WHEN SHE CAME
AROUND WITH MEDS THAT I WAS HAVING TROUBLE
WALKING ~~TOO~~ SAFELY DUE TO MY CONDITION
AND THE FLOORS BEING SLICK AND WET. SHE
TOLD ME TO BE CAREFUL. ON ~~THE~~ THE
14TH OF MAY I WOKE UP FOR BOND
COURT AND THE FLOORS WERE STILL WET
BUT AFTER I RETURNED THE FLOORS WERE

MUCH SICKER DUE TO THEM BEING MOPPED.
I SPENT MOST OF THE DAY AT THE TABLE
PLAYING CARDS AND I DIDNT WALK AROUND
OTHER THAN TO GO TO THE RESTROOM OR
GO TO THE DOOR TO GET MY MEALS BECAUSE
I WAS ~~SCARED~~ ^{SCARED} I WOULD FALL. ALMOST
~~EVERY~~ EVERY BODY IN THE POD ASKED THE
GUARDS TO TURN OFF THE AIR CONDITION,
SO THE FLOORS WOULD DRY UP AND IT
WOULD COOL DOWN OR AT LEAST BRING
SOME FANS IN TO DRY THE FLOOR. AROUND
10 PM AT LIGHTS OUT I WENT TO THE
BATHROOM TO FILL MY BOWL WITH WATER
SO I WOULD HAVE SOMETHING TO DRINK
IF I GOT THIRSTY IN THE NIGHT. WHILE
I WAS ~~WALKING~~ WALKING TO THE SINK I SLIPPED
AND FELL HURTING MY SHOULDER AND MY
HIP. SOME OF THE ~~OTHER~~ INMATES CAME
TO HELP ME UP WHILE THE OTHERS GOT SOME
HELP FROM THE GUARDS. THE GUARDS AND THE NURSE
CAME IN AND HELPED ME TO MY BED. THE NURSE
EXAMINED ME AND SAID HE DIDNT THINK I HAD
ANY INJURIES. GAVE ME A IBUPROFEN AND
TOLD ME THAT THE NURSE THAT BROUGHT MEDS
IN THE MORNING WOULD CHECK ON ME AND GIVE
ME SOME MORE IBUPROFEN. WHEN THE NURSE CAME
AROUND HE DIDNT KNOW ANYTHING ABOUT ANY

OF IT. AS A RESULT OF THE FALL I'M HURTING
IN MY RIGHT SHOULDER AND HIP AND EVERYTIME I
ASK ANY OF THE STAFF OR NURSES THEY ACT LIKE
THEY ~~D~~ DONT KNOW ANYTHING ABOUT IT.

I FEEL LIKE WILLIAMSON COUNTY SHERIFFS
OFFICE HAS SHOWN NEGLECT ~~AND~~ ~~AND~~ AND
DELIBERATE INDIFFERENCE NOT ONLY TO ME BUT TO
EVERY INMATE THAT HAS SLIPPED AND FELL ON
THE FLOORS THAT WERE WET AND THE JAIL STAFF
REFUSED TO DO ANYTHING ABOUT IT AND THEY HAVE SHOWN
DELIBERATE INDIFFERENCE TO ME ~~AND~~ AND NEGLECT
TO PUT ME IN A PLACE WITH HANDICAP ACCESSIBLE
BATHROOM FACILITIES AS REQUESTED AND REQUESTED.
I'M ASKING THAT THE WILLIAMSON COUNTY SHERIFFS
OFFICE BE FOUND LIABLE FOR DAMAGES TO
MY SHOULDER AND HIP AND ~~THE~~ PAIN AND SUFFERING
TO BE RETURNED BY A JURY.

RESPECTFULLY SUBMITTED
THIS 19TH DAY OF MAY 2023

Daniel L. Miles
DANIEL L MILES

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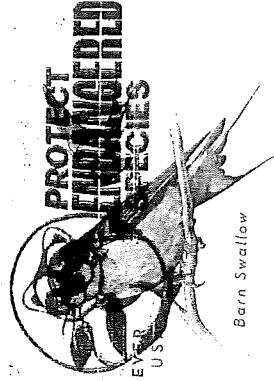
Daniel Hicks

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FRANKLIN TN 37064

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NASHVILLE TN 370

19 MAY 2023 PM 6 FOREVER US



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Court For The Middle District
Of Tennessee

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NASHVILLE TN 37203

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